

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRIAN KEMP, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' AND FULTON COUNTY DEFENDANTS'  
STIPULATION CONCERNING DEPOSITIONS OF FULTON COUNTY  
DEFENDANTS AND RICHARD BARRON**

Come now Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (“Curling Plaintiffs”) and the Members of the Fulton County Board of Registration and Elections (“Fulton County Defendants”), concerning the Curling Plaintiffs’ Amended Notice of Deposition of Fulton County Defendants pursuant to Fed. R. Civ. P. 30(b)(6) and the Amended Notice of Deposition of Richard Barron (the “Relevant Notices”), and state as follows:

1. Curling Plaintiffs first noticed a Rule 30(b)(6) deposition of Fulton County Defendants on July 16, 2021.

2. Pursuant to discussions among undersigned counsel for Curling Plaintiffs and Fulton County Defendants, Curling Plaintiffs recently issued the Relevant Notices to depose Richard Barron as designee for Fulton County

Defendants on certain topics and subsequently in his personal capacity on November 10, 2021.

3. On November 8, 2021, Plaintiffs Coalition for Good Governance, Ricardo Davis, Laura Digges, William Digges, III, and Megan Missett (“Coalition Plaintiffs”) filed their Motion For Extension Of Time To Complete Discovery With Brief In Support [ECF No. 1204].

4. Coalition Plaintiffs state in their Motion that certain documents, data, and written discovery responses they have requested from Fulton County Defendants and which they assert bear directly on their injuries-in-fact “must be received and analyzed before Coalition Plaintiffs will be prepared to conduct their planned Rule 30(b)(6) deposition of Fulton County because the substance of the materials will be a substantial part of any deposition.” [ECF No. 1204] at 3-4.

5. Given Coalition Plaintiffs’ pending Motion for a discovery extension and an ongoing dispute concerning document productions from Fulton County Defendants, Curling Plaintiffs and Fulton County Defendants accordingly stipulate as follows:

- a. Curling Plaintiffs will suspend the depositions noticed in the Relevant Notices to a date between November 10, 2021 and December 6, 2021.

- b. Fulton County Defendants agree to produce Richard Barron for his personal-capacity deposition and as the 30(b)(6) designee for topics 5, 10, 18, 19 and all subparts, 20, 21 and all subparts, 22, 23, 24, 25, and 26 of Curling Plaintiffs' 30(b)(6) notices, as he was previously noticed for November 10. This agreement does not restrict Fulton County Defendants' ability to timely choose to designate Mr. Barron as their corporate deponent for other timely-noticed topics of deposition.
- c. Fulton County Defendants will not object to the admissibility of Richard Barron's or Fulton County Defendants' 30(b)(6) testimony based on the date of these depositions falling after November 15.
- d. Should the Court issue an order on or before December 3, 2021 granting Coalition Plaintiffs' pending Motion for an extension of discovery, Curling Plaintiffs and Fulton County Defendants will confer in good faith about when these depositions will take place.
- e. Upon agreement among counsel for Curling Plaintiffs and Fulton County Defendants as to when the depositions noticed in the Relevant Notices will proceed, Curling Plaintiffs will issue amended notices of deposition.

Respectfully submitted, this 9th day of November 2021.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

**Adam M. Sparks**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2021, a copy of the foregoing  
CURLING PLAINTIFFS' AND FULTON COUNTY DEFENDANTS'  
STIPULATION CONCERNING DEPOSITIONS OF FULTON COUNTY  
DEFENDANTS AND RICHARD BARRON was electronically filed with the  
Clerk of Court using the CM/ECF system, which will automatically send  
notification of such filing to all attorneys of record.

**Adam M. Sparks**  
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